

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
DAVENPORT DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,**

**Plaintiff,**

**v.**

**Civil Action No.  
3:11-cv-00041-CRW-TJS**

**HILL COUNTRY FARMS, INC., d/b/a  
HENRY'S TURKEY SERVICE,**

**Defendant.**

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**DEFENDANT'S PROPOSED JUDGMENT TERMS**

1. Compensatory and punitive damages  
not to exceed \$50,000.00 per complainant  
42 U.S.C. §1981a(b)(3)
2. Attorney fees and expert fees -0-  
42 U.S.C. §2000e-5  
42 U.S.C. §212101
3. Costs as taxed by clerk  
28 U.S.C. §1920

/s/ David Scieszinski  
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INC., et.al

**CERTIFICATE OF SERVICE**

This is to certify that on May 10 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF system of filing, which will transmit a Notice of the Electronic Filing the Plaintiff's counsel, who is an EFC registrant.

ROBERT A. CANINO  
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/s/ David Scieszinski

David Scieszinski